

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KARIM P. NAJJAR, *et al.*, individually  
and behalf of all others similarly situated,

Plaintiffs,

v.

RIAD SALAMEH, *et al.*,

Defendants.

Civil Action No. 1:24-cv-05043-CPO-EAP

**STIPULATION FOR AN EXTENSION OF TIME TO FILE,  
AND A BRIEFING SCHEDULE FOR, MOTIONS TO DISMISS  
THE FIRST AMENDED CLASS ACTION COMPLAINT**

Plaintiffs Karim P. Najjar, Halim Abou-Faycal, Younes Bazzi, Jacques Fontaine, Mounir Jermany, Ibrahim Khreibani, Bechara Rizk, Samar Shami, Joseph Tleiji, Salim Tleiji and Ramzi Zibaoui (“Plaintiffs”), individually and on behalf of a proposed class of similarly situated persons, and Defendants BDO USA, P.C., Deloitte LLP, Deloitte & Touche LLP, and Ernst & Young U.S. LLP (collectively, “U.S. Defendants”), submit this joint stipulation, by and through their undersigned counsel and pursuant to Section II of the Court’s Judicial Preferences, as follows:

1. WHEREAS, on September 13, 2024, the U.S. Defendants filed pre-motion letters in advance of their motions to dismiss the First Amended Class Action Complaint (“FAC”) (ECF Nos. 6, 9, 11) pursuant to a Stipulation So Ordered by the Court on August 15, 2024 (ECF No. 5);

2. WHEREAS, on September 19, 2024, the Court issued a Text Order (ECF No. 14), stating in part that the Court “does not believe that a pre-motion conference would be productive at this time” and that “the parties may proceed with filing their proposed motion if they choose to do so”;

3. WHEREAS, counsel for Plaintiffs and counsel for the U.S. Defendants have conferred and agreed to: (i) an extension of the time within which the U.S. Defendants may file their motions to dismiss the FAC; and (ii) a briefing schedule for those motions;

4. WHEREAS, the U.S. Defendants preserve and have not waived any applicable defenses, including those pursuant to Federal Rule of Civil Procedure 12(b), such as for lack of jurisdiction;

5. THEREFORE, it is hereby stipulated and agreed that:

- a) The U.S. Defendants shall file their motions to dismiss the FAC on or before November 26, 2024.
- b) Plaintiffs shall file their oppositions to the motions on or before January 27, 2025.
- c) The U.S. Defendants shall file their replies in further support of their motions on or before February 25, 2025.

**SO ORDERED.**

\_\_\_\_\_  
Christine P. O'Hearn, U.S.D.J.

Dated: \_\_\_\_\_

Dated: September 25, 2024

By: s/ James E. Cecchi

James E. Cecchi  
**CARELLA, BYRNE, CECCHI,  
BRODY & AGNELLO, P.C**  
5 Becker Farm Road  
Roseland, New Jersey 07068  
Telephone: (973) 994-1700  
jcecchi@carellabyrne.com

Charles J. LaDuca\*  
Daniel M. Cohen\*  
Monica Miller\*  
**CUNEO GILBERT & LADUCA, LLP**  
4725 Wisconsin Ave NW, Suite 200  
Washington, DC 20016  
Telephone: 202-789-3960  
charles@cuneolaw.com  
daniel@cuneolaw.com  
monica@cuneolaw.com

Robert K. Shelquist\*  
Rebecca A. Peterson\*  
**LOCKRIDGE GRINDAL NAUEN PLLP**  
100 Washington Avenue South,  
Suite 2200  
Minneapolis, Minnesota 55401  
Telephone: 612-339-6900  
rkshelquist@locklaw.com  
rapeterson@locklaw.com

John W. ("Don") Barrett\*  
Katherine Barrett Riley\*  
**BARRETT LAW GROUP, P.A.**  
P.O. Box 927  
404 Court Square North  
Lexington, Mississippi 39095  
Telephone: (662) 834-2488  
donbarrettpa@gmail.com  
kbriley@barrettlawgroup.com

*Counsel for Plaintiffs and the Proposed  
Classes*

*\* To be admitted pro hac vice*

Respectfully Submitted,

By: s/ David Kiefer

David Kiefer  
Gregory G. Ballard\*  
Fabiola Vega\*  
*\*pro hac vice to be sought*  
**MCDERMOTT WILL & EMERY LLP**  
One Vanderbilt Avenue  
New York, NY 10017-3852  
Telephone: (212) 547-5400  
dkiefer@mwe.com  
gballard@mwe.com  
fvega@mwe.com

*Attorneys for Defendant BDO USA, P.C.*

By: s/ Jennifer Suh

Jennifer Suh  
William R. Maguire\*  
Carl W. Mills\*  
*\*pro hac vice to be sought*  
**HUGHES HUBBARD & REED LLP**  
One Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 837-600  
Jennifer.suh@hugheshubbard.com  
bill.maguire@hugheshubbard.com  
carl.mills@hugheshubbard.com

*Attorneys for Defendant Ernst & Young  
U.S. LLP*

By: s/ Michael Martinez

Michael Martinez  
Michael J. Dell\*  
Tobias B. Jacoby\*  
*\*pro hac vice to be sought*  
**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**  
1177 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 715-9100  
mdell@kramerlevin.com

*Attorneys for Defendants Deloitte LLP and  
Deloitte & Touche LLP*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of September, 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/ Michael Martinez